

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

v.

ANDREW R. VARA, in his capacity as the
United States Trustee for Region 3; TARA
TWOMEY, in her capacity as Director of the
Executive Office for United States Trustees;
and THE UNITED STATES TRUSTEE
PROGRAM,

Defendants.

Adversary No. 22-50516 (JKS)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, made applicable herein by Federal Rule of Bankruptcy Procedure 7056, Defendants, Andrew R. Vara, in his official capacity as United States

¹ On February 25, 2019, the Court entered an order closing the Bankruptcy Cases of all Debtors except Woodbridge Group of Companies, LLC and Woodbridge Mortgage Investment Fund 1, LLC (together, the "Remaining Debtors"). The Remaining Debtors' Bankruptcy Cases are being jointly administered under Case No. 17-12560 (KJC). The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Trustee for Region 3 (“United States Trustee”), Tara Twomey, in her official capacity as Director of the Executive Office for United States Trustees, and the “United States Trustee Program,” (collectively “Defendants”), hereby move for summary judgment. In support of this motion, Defendants rely on the record in the adversary proceeding and the concurrently-filed *Memorandum of Law In Support of Defendants’ Motion for Summary Judgment and Response To Plaintiff’s Motion For Summary Judgment*, and such additional facts and law as this Court may consider through judicial notice or otherwise.

WHEREFORE, Defendants respectfully request that the Court enter judgment in their favor and against Plaintiff and grant such other and further relief that may be appropriate or just.

Date: September 15, 2023

Respectfully submitted,

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Deputy Director/General Counsel
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By: /s/ Timothy J. Fox
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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2023, I electronically filed the foregoing with the Clerk of this Court using the CM/ECF system which will send notification of such filing to all ECF registrants in this case. I further certify that the foregoing was emailed to counsel for Plaintiff:

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|--|--|

/s/ Timothy J. Fox

Timothy J. Fox, Jr. (DE Bar No. 6737)